

## REMARKS

The present amendment and remarks are in response to the final office action entered in the above-identified case and mailed on June 19, 2006. Claims 1-17 are pending in the application. Claims 1-3, 5-8, 10-14, 26 and 17 stand rejected under 35 U.S.C §103(a) as being unpatentable over Nakabayashi (U.S. 5,675,672) in view of Teufel et al. (U.S. 6,243,503). Claims 4, 9 and 15 were also rejected under 35 U.S.C §103(a) as being unpatentable over Nakabayashi and Teufel et al. further in view of Fisher et al. (U.S.2001/0030693 A1). With this response Applicant has amended claims 1,4-7, and 9-12 and canceled dependent claims 2, 3, 8 and 14. Applicant respectfully submits that all of the remaining claims are now in condition for allowance.

Amended Claim 1 is representative of the changes that have been made to the pending claims. Claim 1 now calls for, among other things, capturing a plurality of partially overlapping digital images of a document with an image capture device. Claim 1 further calls for maintaining image sequence information identifying the sequential order in which the images are captured, and receiving direction information indicative of the direction of movement between the image capture device and the document during the capture of the plurality of digital images. Optical character recognition is performed on each one of the plurality of captured digital images to generate a plurality of electronic text files corresponding to the captured partially overlapping images of the document. The electronic text files are compared with one another based on the sequence and direction information to identify overlapping sequences of characters appearing in common in the electronic text files corresponding to partially overlapping digital images of adjacent portions of the document. Finally, the plurality of electronic text files are combined into a

combined text file based on the comparison in a manner that is consistent with the received direction information and the sequential order in which the images were captured.

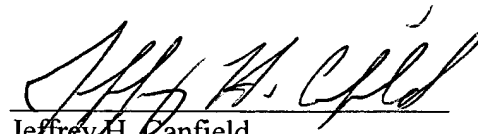
Nakabayashi and Teufel et al., alone and in combination, fail to teach these features of the claimed invention. Nakabayashi merely teaches that rows and columns of coded characters are stored in a memory in the same order or sequence as the original characters appeared to the scanner (i.e. as they appeared on the original document) without identifying coordinates of a reference frame. Nakabayashi does teach stitching text files together based on common character sequences, but Nakabayashi says nothing regarding stitching the text files together based on the order in which corresponding images were captured, or the direction of travel between an image capture device and the document while images were captured.

Teufel et al. teach a motion detector that detects the movement of a reading device along the marked surface of a document. The motion detector generates synchronizing signals. An electronic closure determines the start and the end of the sequence of synchronizing signals and thus the size of the portion of the image detected by the reading device. (Col. 8, Lines 7-12). Again, Teufel et al. teach nothing regarding the use of the motion detection signal as a basis for comparing text files corresponding to partially overlapping images or portions of a document, or using the order in which images were captured along with direction information relating to a direction of relative movement between an image capture device and a document for efficiently identifying character sequences common to multiple text files or determining a proper order for stitching together corresponding partial image text files.

Claims 7 and 12 have been amended in a manner similar to that of Claim 1. It would not have been obvious to combine the teaching of Teufel et al. with that of Nakasayashi, however, even when combined, Nakabayashi and Teufel et al. fail to teach or suggest the invention as now claimed. Claims 1, 7 and 12 and the claims depending therefrom would not have been obvious to one of ordinary skill in the art at the time the invention was made and should be allowed.

With regard to claims 4, 9, and 15, Fisher et al. are cited for teaching capturing a plurality of digital images with a digital camera and providing direction information with a user input device of the digital camera. However, claims 4, 9 and 15 depend from independent claims 1, 7 and 12 respectively. The teaching of Fisher et al. does not address the elements of independent claims 1, 7 and 12 not taught or suggested by Nakabayashi and Teufel et al. It still fails to teach or suggest every claim element of claims 4, 9, and 15. Accordingly, these claims should be allowed as well.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Jeffrey H. Canfield", is written over a horizontal line.

Jeffrey H. Canfield  
Registration No. 38,404  
Attorney for Applicant

BRINKS HOFER GILSON & LIONE  
P.O. BOX 10395  
CHICAGO, ILLINOIS 60610  
(312) 321-4200